As a 46 year old amateur radio operator licensed since the late 1960s (WN9ZAZ, WA9ZAZ, currently N3FDR, Amateur Extra class received June 2002), I am writing to oppose the elimination of the Morse requirement for upper-level license classes. The uniqueness of the amateur service and its distinction from other radio services would be harmed by extending No-Code licensing throughout the license structure. There are currently sufficient frequencies and modes available to No-Code amateurs to carry out hobby activities, experimentation, participate in public service, and learn the operating techniques necessary to become a skilled amateur. Preserving the Morse element for upper-level licensing (General and beyond) makes a clear statement about the skill level expected of the highest license classes of the amateur service. Furthermore, CW is still the most efficient, reliable, and "bulletproof" method of radio communications, and it should be expected that amateurs be able to communicate via this mode in public service and emergency situations. Finally, Morse code and CW operation connect amateur radio to its historic traditions and roots, further enhancing its prestige and effectiveness as a largely selfregulating service in the public interest. Maintaining a certain standard of accomplishment in the culture of ham radio will help this tradition prosper, while preserving the ease of access to the upper amateur ranks that was accomplished with the elimination of the 13 and 20 wpm requirements. I strongly urge the retention of the Morse code element for the General and Extra class licenses.

Thank you for the opportunity to comment, Rick Davis N3FDR